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Attorneys for Richard Walter

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of **S.M.**, a minor,

Plaintiffs,

v.

MARK DANIELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, VIDOCQ SOCIETY, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE.

Defendants.

Case No.: 6:20-cv-01163-MK (Lead Case)

**DECLARATION OF ERIC S. DEFREEST
IN SUPPORT OF RICHARD WALTER'S
RESPONSE JOINING STATE'S MOTION
FOR EXTENSION**

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of **S.M.**, a minor,

Plaintiffs,

v.

OREGON STATE POLICE.

Defendant.

VIDOCQ SOCIETY,

Cross-Claim Plaintiff,

v.

MARK DANIELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE,

Cross-Claim Defendants.

RICHARD WALTER,

Cross-Claim Plaintiff,

v.

MARK DANIELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, VIDOCQ SOCIETY, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE,

Cross-Claim Defendants.

Case No.: 3:21-cv-01719-MK (Trailing Case)

I, Eric S. DeFreest, hereby declare as follows:

1. I am one of the attorneys for defendant/cross-claim plaintiff Richard Walter in the above-captioned cases and I make this declaration upon my personal knowledge.

2. A close family member of mine has required emergency medical care as of December 30, 2024, which is continuing in nature through the present time, and which pragmatically negatively impacts my ability to focus upon the completion of the anticipated filing of a motion for summary judgment on behalf of defendant/cross-claim plaintiff Richard Walter.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 2nd day of January, 2025.

LUVAAS COBB

By: /s/ Eric S. DeFreest
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